

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

In Re BAYCOL PRODUCTS LITIGATION,

This Document Relates to:

United States ex rel. Simpson,

Plaintiff,

v.

Bayer Healthcare et al.,

Defendants.

MDL No. 1431

Civ. No. 08-5758 (MJD/ECW)
Hon. Michael J. Davis

Oral Argument Requested

**MOTION BY OLSHAN FROME WOLOSKY LLP SEEKING: (1) INTERVENTION;
(2) REASONABLE ATTORNEYS' FEES AND RELATED COSTS**

PLEASE TAKE NOTICE THAT prior counsel to Laurie Simpson (the “Relator”), Olshan Frome Wolosky LLP (“Olshan”), hereby respectfully moves the Court for the following relief:

1. Intervention in Relator’s Fee Motion;
2. Award of \$689,334.75 in attorneys’ fees and expenses and \$11,236.83 in out-of-pocket costs it incurred while representing the Relator from June 22, 2009 to July 23, 2010; and
3. Award of \$94,663.20 in fees and expenses incurred litigating its fee application from October 25, 2022 to January 5, 2023, plus any reasonable attorneys’ fees, expenses and costs additionally incurred through the remainder of this litigation.

Dated: New York, New York
January 6, 2023

By: /s/ Kyle C. Bisceglie
Kyle C. Bisceglie (*pro hac vice*)
OLSHAN FROME WOLOSKY LLP
Proposed Intervenor and
Former Counsel to Relator Laurie Simpson
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